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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER COMPANY'S APPLICATION TO UPDATE ITS WIND INTEGRATION RATES AND CHARGES.	)	**CASE NO. IPC-E-13-22**
	)	**SUPPLEMENTARY COMMENTS OF THE COMMISSION STAFF**

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Kristine A. Sasser, Deputy Attorney General, and in response to the Notice of Amended Schedule issued in Order No. 33075 on July 15, 2014, in Case No. IPC-E-13-22, submits the following supplementary comments.

BACKGROUND

On November 29, 2013, Idaho Power Company ("Idaho Power" or"Company") filed an Application with the Commission seeking to update its wind integration rates and charges. The Company's Application includes a 2013 Wind Integration Study Report as well as the supporting testimony of Philip DeVol and Michael J. Youngblood.

In its Application, Idaho Power requested that the Commission approve the updated wind integration costs as identified in its 2013 Wind Study and set forth in the proposed Schedule 87. Idaho Power proposed two overall changes to address the collection of wind integration costs. The first change abandons the use of a percentage of avoided cost rate allocation and instead

allocates a fixed amount based upon penetration level. The second change decouples the wind integration charge from the avoided cost rate contained in the power sales agreement and instead has wind integration costs assessed as a standalone tariff charge. These changes were incorporated in three proposed methods for implementing integration charges. The first method retained the existing structure of wind integration charges consisting of three different tiers of charges for three different wind penetration levels, but simply updated the current charges consistent with the results of the 2013 Wind Study. Under the second method, the Company proposed adoption of a wind integration tariff that would specify integration charges at 100 MW increments of wind penetration. The third method also involved a tariff-based approach, but proposed that all wind generators, new and existing, would share equitably in the costs of integrating wind onto the Company's system.

Motions to Dismiss were filed by twelve intervenors on January 31, 2014. The intervenors claimed that Idaho Power's Application illegally requests "that the Commission modify the rates and terms in existing contractual legally enforceable obligations for qualifying facilities (QFs) without the consent of the QFs." The Petitioners asserted that unilateral modification of existing contracts is a violation of PURPA and "the administrative process of entertaining Idaho Power's Application" is preempted by federal law. In Order No. 33030, the Commission denied the Motion to Dismiss, but did order that the outcome of the underlying proceeding only be applied prospectively—to new contracts as they are entered into by the parties and submitted to the Commission for approval.

On July 2, 2014, comments on Idaho Power's Application were submitted by the Commission Staff ("Staff") and the American Wind Energy Association/Renewable Northwest ("AWEA/RNW"). Idaho Power filed Reply Comments on July 22, 2014 for three primary purposes: 1) to correct statements from the Company's initial Application; 2) to present Idaho Power's revised recommendation to implement wind integration charges on an hourly incremental cost basis for every 100 megawatts ("MW") of penetration through an intermittent generation integration charge tariff, consistent with Order No. 33030 which restricted application of new integration charges to new contracts only; and 3) to respond to comments of the Commission Staff and AWEA/RNW. A Notice of Amended Schedule was issued on July 15, 2014 to accommodate additional discovery, and to establish supplementary comment and reply deadlines. *See* Order No. 33075.

STAFF ANALYSIS

In its Reply Comments, Idaho Power agreed with the following Staff recommendations: 1) to accept the results of the Company's 2013 Wind Integration Study; 2) to recover the full incremental cost of integration from new wind projects; and 3) to implement integration charges as a dollar per megawatt-hour ("MWh") charge rather than as a percentage of avoided cost rates. Idaho Power proposes further that a wind integration charge be implemented to recover the full incremental cost of integration at 100 MW increments, and that those charges be set forth in Schedule 87 for intermittent generation integration charges.

Correction to Tier Levels and Costs in the Application

Idaho Power noted in its Reply Comments that Staff's recommendation with regard to the three tiers that were set forth in Idaho Power's Application as "Method 1" is based upon an incorrect breakout of the tier levels that Idaho Power erroneously reported in its Application. The Company's testimony correctly set forth the tier and cost information; however, it was summarized erroneously in the Application. In addition, Idaho Power clarified that the 2013 Wind Integration Study utilized a 2017 test year, and reports all numbers in 2017 dollars. To correct the errors and clarify the costs, Idaho Power provided the following tables, meant as replacement tables for those that appear on pages 5 and 6 of the Application:

Average Integration Cost Per MWh

Build-out Scenarios	0-800 MW	0-1,000 MW	0-1,200 MW
Integration Cost (2017 dollars)	$6.83	$10.22	$14.22
Integration Cost (2014 dollars)	$6.25	$9.35	$13.01

Incremental Integration Cost per MWh

Penetration Level	678 – 800 MW	801 – 1,000 MW	1,001 – 1,200 MW
Integration Cost (2017 dollars)	$8.67	$24.00	$34.70
Integration Cost (2014 dollars)	$7.93	$21.96	$31.76

Staff acknowledges the corrections and clarifications provided by Idaho Power in its Reply Comments. As it did in its initial Comments, Staff continues to support the integration costs as determined by Idaho Power in its 2013 Wind Study for each of the respective penetration levels considered. Moreover, as discussed in more detail below, Staff continues to support the Company's proposal to assess integration charges to new projects on an incremental basis.

Proposed Intermittent Generation Integration Charge Tariff

Because Idaho Power's initial Application contained multiple options/proposals for the implementation of updated wind integration costs, the Company's proposal to implement an intermittent generation integration charge tariff as presented in its Reply Comments is now somewhat different, given the Commission's determination in Order No. 33075 that integration charges in existing contracts will not be changed. Idaho Power proposes a new tariff, Schedule 87, Intermittent Generation Integration Charges. This is the same Schedule 87 and proposal that the Company recently submitted for the implementation of solar integration costs in Case No. IPC-E-14-18. The tariff does not provide for modifying or changing the integration cost that is contained in a Commission-approved contract. The tariff, and any change to the integration charge in the future, would only apply to new contracts and obligations entered into subsequent to its approval by the Commission.

Idaho Power states that Schedule 87 is meant to provide the wind and solar integration charges consistent with the most recent Commission-approved integration study applicable to both wind and solar generation, respectively. The Company provided a draft of Schedule 87, submitted as Attachment 1 to its Application that contains only the proposed incremental integration charges for wind generation based upon the 2013 Study. It also contains a placeholder for the inclusion of the appropriate solar integration charges, once they are determined by the Commission. (The Company submitted the same draft Schedule 87 as Exhibit No. 2 in Case No. IPC-E-14-18 that contains the proposed incremental integration charges for solar generation, and a placeholder for the inclusion of an appropriate wind integration charge).

As proposed by Idaho Power, the charges set forth in Schedule 87 are the amounts to be deducted from avoided cost rates each year, beginning in the year the project comes on-line, based on the nameplate capacity of installed wind generation at the scheduled operation date of the proposed new project. The integration charges set forth in Schedule 87, the Company states, are formatted to appear in the same format as that used by the Commission to post the published

avoided cost rates. Each penetration level (for each 100 MW increment of wind penetration) has its own table clearly identified and set forth in Schedule 87, and discloses both the levelized integration charge as well as the non-levelized stream of integration charge amounts listed by year. Just like published avoided cost rates, the scheduled operation date for the proposed generation project is used as the starting point in the table, and each yearly amount through the term of the proposed contract is set out accordingly. Idaho Power proposes that these amounts would be included in the PURPA energy sales agreement for a new project, and would remain as set forth in that agreement for the entire term of the agreement.

Staff reviewed the calculations performed by Idaho Power to translate the incremental wind integration charges from the 2013 Wind Study into the proposed Schedule 87 tariff. In its computations, the Company assumed a three percent inflation rate to convert real into nominal charges, and applied a discount rate of 6.7 percent to levelize the charges. In response to Staff production requests, Idaho Power states that both of these rates were chosen because they were the percentage rates used in the 2013 Integrated Resource Plan. Staff believes that use of a three percent inflation rate is reasonable. However, Staff would prefer that the Company use a discount rate consistent with that used for levelizing avoided cost rates computed in the Surrogate Avoided Resource (SAR) methodology. That rate is equal to the utility's weighted cost of capital from its most recent general rate case, unadjusted for tax effects. Currently for Idaho Power, that rate is 8.18 percent, established in 2009 in Case No. IPC-E-08-10, the last general rate case in which cost of capital was explicitly specified. Use of an 8.18 percent discount rate and a three percent inflation rate produces the wind integration charges shown on Attachment 1. These rates are comparable to, but slightly lower than those proposed by Idaho Power in its Schedule 87.

Idaho Power's Recommended Implementation of Wind Integration Charges

In its Reply Comments, Idaho Power also clarified how its proposed intermittent generation integration charge tariff would be structured and how it would work. The Company explained that the 2013 Study identified wind integration costs at 800 MW, 1,000 MW, and 1,200 MW. The incremental integration costs at 100 MW increments were then determined by first fitting a smooth curve to each of the studied penetration level costs identified in the 2013 Study, then using the respective curve's formula to identify the associated costs at each 100 MW penetration level. Idaho Power's proposal to implement wind integration costs at 100 MW increments is the same as its proposal to implement solar integration costs at 100 MW increments.

Idaho Power explained that the 2013 Wind Integration Study identified an average integration cost for all wind generation from 0-1,200 MW of $14.22. That means that if the total cost of integrating 1,200 MW of wind were to be spread equally to all 1,200 MW of wind generation, the cost of integration would be $14.22 for each MWh generated. However, if that same cost of integrating 1,200 MW of wind were to be broken up into increments, the incremental integration cost for the first increments would be much lower, while the cost for the later increments increases. In aggregate, the total cost of integrating wind indentified by either method, the average integration cost or the incremental integration cost, is the same. The cost of wind integration increases as the penetration level of wind increases on the system. The 2013 Study identified the discrete cost to integrate wind generation at three discrete penetration levels. However, the Company explained that if costs are assigned on an incremental basis, then costs are more closely assigned with the cause of those costs, and thus the initial generation is assigned a lower cost than generation that comes on line later when it is more costly to integrate.

Idaho Power proposed that a wind integration charge be established to collect the incremental cost of integration at each 100 MW level of wind generation penetration. Because Idaho Power currently has 678 MW[1] of wind currently operating on its system, the updated wind integration charge starts at the 678 MW to 700 MW penetration level, and increases consistently with the costs of integration identified in the 2013 Study, at every 100 MW of wind nameplate capacity penetration level. This results in proposed wind integration charges, in 2017 dollars, of: $13.10 for 678 MW to 700 MW; $17.00 for 701 MW to 800 MW; $21.35 for 801 MW to 900 MW; $26.16 for 901 MW to 1,000 MW; $31.41 for 1,001 to 1,100 MW; and $37.08 for 1,101 MW to 1,200 MW.

Staff appreciates the much clearer explanation in Idaho Power's Reply Comments of how it proposes to apply wind integration charges identified in its 2013 Wind Integration Study. Staff supports the tariff-based approach proposed by Idaho Power in its Reply Comments. Staff also supports application of incremental wind integration charges such that integration charges increase as wind penetration level increases, and that once set forth in an agreement, they remain unchanged for the entire term of the agreement.

[1] With the recent inclusion of 50 MW of wind generation from five fully executed PURPA energy sales agreements in its Oregon jurisdiction, Idaho Power's total current wind generation penetration level is 728 MW.

RECOMMENDATIONS

Staff continues to support the following recommendations from its initial July 22, 2014 comments: 1) to accept the results of the Company's 2013 Wind Integration Study; 2) to recover the full incremental cost of integration from new wind projects; and 3) to implement integration charges as a dollar per megawatt-hour ("MWh") charge rather than as a percentage of avoided cost rates. Staff further recommends that wind integration costs from the 2013 Study be applied using a tariff-based approach in which integration costs are assessed as either levelized or non-levelized charges applied as a discount to avoided cost rates. Staff supports the introduction of Schedule 87 as proposed by Idaho Power, with the exception of the discount rate. Idaho Power applied a discount rate of 6.7 percent to levelize integration charges because it was used in the 2013 Integrated Resource Plan. However, Staff believes that Idaho Power should apply the discount rate used for levelization of published avoided cost rates computed under the SAR methodology, which is currently 8.18 percent. The resulting wind integration charges supported by Staff are shown on Attachment 1.

Staff also recommends that Idaho Power be expected to periodically conduct new wind integration studies as electric markets, technologies, and operating practices evolve, and to update its wind integration charges accordingly as they are contained in any approved tariffs such as Schedule 87.

Respectfully submitted this 4TH day of September 2014.

Kristine A. Sasser
Deputy Attorney General

Technical Staff: Rick Sterling
Yao Yin

i:umisc:comments/ipce13.22ksrpsyy supp comments

0 - 100 MW Wind Capacity Penetration Level

LEVELIZED	
ON-LINE YEAR	20 YEAR CONTRACT TERM LEVELIZED RATES
2014	0.27
2015	0.27
2016	0.28
2017	0.29
2018	0.30
2019	0.31

NON-LEVELIZED	
CONTRACT YEAR	NON-LEVELIZED RATES
2014	0.21
2015	0.22
2016	0.23
2017	0.23
2018	0.24
2019	0.25
2020	0.25
2021	0.26
2022	0.27
2023	0.28
2024	0.29
2025	0.29
2026	0.30
2027	0.31
2028	0.32
2029	0.33
2030	0.34
2031	0.35
2032	0.36
2033	0.37
2034	0.38
2035	0.40
2036	0.41
2037	0.42
2038	0.43
2039	0.45

101 - 200 MW Wind Capacity Penetration Level

LEVELIZED	
ON-LINE YEAR	20 YEAR CONTRACT TERM LEVELIZED RATES
2014	1.22
2015	1.25
2016	1.29
2017	1.33
2018	1.37
2019	1.41

NON-LEVELIZED	
CONTRACT YEAR	NON-LEVELIZED RATES
2014	0.98
2015	1.00
2016	1.04
2017	1.07
2018	1.10
2019	1.13
2020	1.16
2021	1.20
2022	1.24
2023	1.27
2024	1.31
2025	1.35
2026	1.39
2027	1.43
2028	1.48
2029	1.52
2030	1.57
2031	1.61
2032	1.66
2033	1.71
2034	1.76
2035	1.81
2036	1.87
2037	1.93
2038	1.98
2039	2.04

201 - 300 MW Wind Capacity Penetration Level

LEVELIZED	
ON-LINE YEAR	20 YEAR CONTRACT TERM LEVELIZED RATES
2014	2.78
2015	2.87
2016	2.95
2017	3.04
2018	3.13
2019	3.23

NON-LEVELIZED	
CONTRACT YEAR	NON-LEVELIZED RATES
2014	2.23
2015	2.30
2016	2.37
2017	2.44
2018	2.51
2019	2.59
2020	2.67
2021	2.75
2022	2.83
2023	2.92
2024	3.00
2025	3.09
2026	3.19
2027	3.28
2028	3.38
2029	3.48
2030	3.59
2031	3.69
2032	3.80
2033	3.92
2034	4.04
2035	4.16
2036	4.28
2037	4.41
2038	4.54
2039	4.68

301 - 400 MW Wind Capacity Penetration Level

LEVELIZED	
ON-LINE YEAR	20 YEAR CONTRACT TERM LEVELIZED RATES
2014	4.95
2015	5.10
2016	5.26
2017	5.41
2018	5.58
2019	5.74

NON-LEVELIZED	
CONTRACT YEAR	NON-LEVELIZED RATES
2014	3.98
2015	4.10
2016	4.22
2017	4.35
2018	4.48
2019	4.61
2020	4.75
2021	4.89
2022	5.04
2023	5.19
2024	5.34
2025	5.51
2026	5.67
2027	5.84
2028	6.02
2029	6.20
2030	6.38
2031	6.57
2032	6.77
2033	6.97
2034	7.18
2035	7.40
2036	7.62
2037	7.85
2038	8.08
2039	8.33

401 - 500 MW Wind Capacity Penetration Level

LEVELIZED	
ON-LINE YEAR	20 YEAR CONTRACT TERM LEVELIZED RATES
2014	7.71
2015	7.95
2016	8.18
2017	8.43
2018	8.68
2019	8.94

NON-LEVELIZED	
CONTRACT YEAR	NON-LEVELIZED RATES
2014	6.19
2015	6.38
2016	6.57
2017	6.77
2018	6.97
2019	7.18
2020	7.39
2021	7.62
2022	7.84
2023	8.08
2024	8.32
2025	8.57
2026	8.83
2027	9.09
2028	9.37
2029	9.65
2030	9.94
2031	10.23
2032	10.54
2033	10.86
2034	11.18
2035	11.52
2036	11.86
2037	12.22
2038	12.59
2039	12.96

501 - 600 MW Wind Capacity Penetration Level

LEVELIZED	
ON-LINE YEAR	20 YEAR CONTRACT TERM LEVELIZED RATES
2014	11.05
2015	11.38
2016	11.72
2017	12.07
2018	12.43
2019	12.81

NON-LEVELIZED	
CONTRACT YEAR	NON-LEVELIZED RATES
2014	8.87
2015	9.13
2016	9.41
2017	9.69
2018	9.98
2019	10.28
2020	10.59
2021	10.91
2022	11.23
2023	11.57
2024	11.92
2025	12.28
2026	12.64
2027	13.02
2028	13.41
2029	13.82
2030	14.23
2031	14.66
2032	15.10
2033	15.55
2034	16.02
2035	16.50
2036	16.99
2037	17.50
2038	18.03
2039	18.57

601 - 700 MW Wind Capacity Penetration Level

LEVELIZED	
ON-LINE YEAR	20 YEAR CONTRACT TERM LEVELIZED RATES
2014	14.94
2015	15.39
2016	15.85
2017	16.33
2018	16.82
2019	17.32

NON-LEVELIZED	
CONTRACT YEAR	NON-LEVELIZED RATES
2014	11.99
2015	12.35
2016	12.72
2017	13.10
2018	13.50
2019	13.90
2020	14.32
2021	14.75
2022	15.19
2023	15.65
2024	16.12
2025	16.60
2026	17.10
2027	17.61
2028	18.14
2029	18.68
2030	19.24
2031	19.82
2032	20.42
2033	21.03
2034	21.66
2035	22.31
2036	22.98
2037	23.67
2038	24.38
2039	25.11

701 - 800 MW Wind Capacity Penetration Level

LEVELIZED	
ON-LINE YEAR	20 YEAR CONTRACT TERM LEVELIZED RATES
2014	19.38
2015	19.96
2016	20.56
2017	21.17
2018	21.81
2019	22.46

NON-LEVELIZED	
CONTRACT YEAR	NON-LEVELIZED RATES
2014	15.55
2015	16.02
2016	16.50
2017	17.00
2018	17.51
2019	18.03
2020	18.57
2021	19.13
2022	19.70
2023	20.29
2024	20.90
2025	21.53
2026	22.18
2027	22.84
2028	23.53
2029	24.23
2030	24.96
2031	25.71
2032	26.48
2033	27.27
2034	28.09
2035	28.93
2036	29.80
2037	30.70
2038	31.62
2039	32.57

801 - 900 MW Wind Capacity Penetration Level

LEVELIZED	
ON-LINE YEAR	20 YEAR CONTRACT TERM LEVELIZED RATES
2014	24.34
2015	25.07
2016	25.83
2017	26.60
2018	27.40
2019	28.22

NON-LEVELIZED	
CONTRACT YEAR	NON-LEVELIZED RATES
2014	19.54
2015	20.13
2016	20.73
2017	21.35
2018	21.99
2019	22.65
2020	23.33
2021	24.03
2022	24.75
2023	25.50
2024	26.26
2025	27.05
2026	27.86
2027	28.70
2028	29.56
2029	30.44
2030	31.36
2031	32.30
2032	33.27
2033	34.26
2034	35.29
2035	36.35
2036	37.44
2037	38.56
2038	39.72
2039	40.91

901 - 1000 MW Wind Capacity Penetration Level

LEVELIZED	
ON-LINE YEAR	20 YEAR CONTRACT TERM LEVELIZED RATES
2014	29.82
2015	30.72
2016	31.64
2017	32.59
2018	33.57
2019	34.57

NON-LEVELIZED	
CONTRACT YEAR	NON-LEVELIZED RATES
2014	23.94
2015	24.66
2016	25.40
2017	26.16
2018	26.94
2019	27.75
2020	28.59
2021	29.44
2022	30.33
2023	31.24
2024	32.17
2025	33.14
2026	34.13
2027	35.16
2028	36.21
2029	37.30
2030	38.42
2031	39.57
2032	40.76
2033	41.98
2034	43.24
2035	44.54
2036	45.87
2037	47.25
2038	48.66
2039	50.12

1001 - 1100 MW Wind Capacity Penetration Level

LEVELIZED	
ON-LINE YEAR	20 YEAR CONTRACT TERM LEVELIZED RATES
2014	35.81
2015	36.88
2016	37.99
2017	39.13
2018	40.30
2019	41.51

NON-LEVELIZED	
CONTRACT YEAR	NON-LEVELIZED RATES
2014	28.74
2015	29.60
2016	30.49
2017	31.41
2018	32.35
2019	33.32
2020	34.32
2021	35.35
2022	36.41
2023	37.50
2024	38.63
2025	39.78
2026	40.98
2027	42.21
2028	43.47
2029	44.78
2030	46.12
2031	47.51
2032	48.93
2033	50.40
2034	51.91
2035	53.47
2036	55.07
2037	56.72
2038	58.43
2039	60.18

1101 - 1200 MW Wind Capacity Penetration Level

LEVELIZED	
ON-LINE YEAR	20 YEAR CONTRACT TERM LEVELIZED RATES
2014	42.27
2015	43.54
2016	44.85
2017	46.19
2018	47.58
2019	49.01

NON-LEVELIZED	
CONTRACT YEAR	NON-LEVELIZED RATES
2014	33.93
2015	34.95
2016	36.00
2017	37.08
2018	38.19
2019	39.34
2020	40.52
2021	41.73
2022	42.98
2023	44.27
2024	45.60
2025	46.97
2026	48.38
2027	49.83
2028	51.33
2029	52.87
2030	54.45
2031	56.09
2032	57.77
2033	59.50
2034	61.29
2035	63.12
2036	65.02
2037	66.97
2038	68.98
2039	71.05

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 4th DAY OF SEPTEMBER 2014, SERVED THE FOREGOING **SUPPLEMENTARY COMMENTS OF THE COMMISSION STAFF TO IDAHO POWER COMPANY,** IN CASE NO. IPC-E-13-22, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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